

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONSERVATION LAW FOUNDATION,
INC.,

Plaintiff,

V.

CHELSEA SANDWICH LLC and
GLOBAL COMPANIES LLC,

Defendants.

CIVIL ACTION NO. 1:24-CV-11766-RGS

NOTICE REGARDING STATUS OF NEWTERRA TREATMENT SYSTEM

Defendants Chelsea Sandwich LLC and Global Companies LLC (“Global”) submit this notice to provide the Court with a further update on the continued effectiveness of the Newterra Aquip Filtration System and Purus Containment System (“Newterra System”) at the oil storage terminal located at 11 Broadway in Chelsea, Massachusetts (“Chelsea Facility”) in connection with Global’s pending Motion to Dismiss as Moot.

As of June 16, 2025, the eight-week outfall testing regimen required by Paragraph IV.3 of the August 2024 Administrative Order on Consent (“Order”) was completed. The results from each of the weekly system effluent samples showed that the pollutants named in the Order, among others, met the discharge compliance limits of the Chelsea Permit during each of the eight weeks. See Supp. Decl. of Steven Charron (ECF 42.1) at ¶ 4; Sec. Decl. of Thomas Henderson (ECF 42.2) at ¶¶ 3-7). As a result, the Chelsea Facility returned to normal outfall effluent sampling per the Chelsea Permit’s terms (typically monthly), as stated in the Order. The accompanying Third Declaration of Thomas Henderson confirms that all effluent parameters covered under the Chelsea Permit and the Order continued to measure as non-detect or under

permit limits in both the July and August monthly effluent samples taken after treatment through the Newterra System. Third Decl. of Thomas Henderson, ¶¶ 4-6. Further, Chelsea Sandwich submitted a revised Stormwater Pollution Prevention Plan to EPA and MassDEP on June 30, 2025, to reflect the installation of the Newterra System, as required by Paragraph IV.4 of the Order. *Id.* at ¶ 7.

Respectfully submitted,

**Chelsea Sandwich LLC, and
Global Companies LLC**

By their attorneys,

/s/ Matthew J. Connolly

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Dated: August 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants on August 22, 2025.

/s/ Matthew J. Connolly

Matthew J. Connolly

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